



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CP:TK
F.#2011R00674

*271 Cadman Plaza East
Brooklyn, New York 11201*

April 25, 2011

To Be Filed Under Seal

The Honorable Frederic Block
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Khalil Abdullah, 11-CR-312 (FB)

Dear Judge Block:

The government respectfully requests that the Court reassign the above-referenced case to the Honorable John Gleeson in order to save judicial resources and to benefit the ends of justice and the fair administration of the law.

On April 25, 2011, the above-captioned case was randomly assigned to Your Honor after a grand jury returned a five-count indictment charging the defendant with conspiring to distribute narcotics, possession of narcotics with the intent to distribute, conspiracy to commit money laundering and witness tampering. The indictment is based, in part, on several narcotics seizures, that previously resulted in drug trafficking charges against a member of the same conspiracy, in United States v. Henry Butler et al., 10-CR-560 (JG), which was randomly assigned to Judge Gleeson last year. In addition, the defendant is charged with tampering with Mr. Butler, the main defendant in case currently before Judge Gleeson.¹

In light of the foregoing, and although the two cases do not involve "the same specific conduct" required for "automatic" relation under revised Local Rule 50.3(c) because the Abdullah case involves a longer drug conspiracy than Butler and additional crimes, it may be appropriate to reassign the Abdullah

¹ Henry Butler recently pleaded guilty before Judge Gleeson to participating in the narcotics trafficking conspiracy.

case to Judge Gleeson "on the grounds that a substantial saving of judicial resources will result or that the ends of justice and fair administration so require."

Respectfully submitted,

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cc: The Honorable John Gleeson
Anthony Ricco, Esq.